

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

Michael Patrick Creedon,
Regina Anne Creedon,

Debtors.

Case No. 23-12202-PMM
Chapter 13

Motion to Expedite Consideration of Motion for Stay Pending Appeal

Appellant Michael I. Assad moves this Court as follows:

1. On June 16, 2024, the Appellant filed a Motion for Stay Pending Appeal (the “Substantive Motion”).
2. The Substantive Motion explains the irreparable harm to the Appellant that will occur if it is not granted immediately.
3. Because time is of the essence, the Court must either:
 - a. Enter the order attached to the Substantive Motion *ex parte*.
 - b. Enter a bridge order until the Substantive Motion can be heard.
 - c. Conduct a hearing on the Substantive Motion within twenty-four hours.
4. Given the circumstances and the immediate relief required to prevent irreparable harm, it is not practical for the Appellant to consult with other interested parties to reach an agreement about appropriate times and dates for a hearing.

Date: June 16, 2024

CIBIK LAW, P.C.
Attorney for Appellant

By: 

Mike Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com

Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: June 16, 2024



Mike Assad